

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Case No. 1:23-cv-00369-NRM-RML

Plaintiff,

-against-

RARE BREED TRIGGERS, LLC; RARE
BREED FIREARMS, LLC; LAWRENCE
DEMONICO; KEVIN MAXWELL,

Defendants.

**DECLARATION OF DEFENDANT KEVIN MAXWELL
IN SUPPORT OF DEFENDANTS' MOTION TO QUASH**

I, Kevin Maxwell, have personal knowledge of the following facts set forth below, and if called as a witness I would testify as follows:

1. I am the owner of Rare Breed Triggers, LLC ("Rare Breed Triggers") and currently serve as its chief legal counsel, and also owner of Law Offices of Kevin C. Maxwell.
2. On January 18, 2021, I contacted Mr. Richard Vasquez regarding Rare Breed Triggers' interest in retaining him as an expert.
3. Retainer and non-disclosure agreements between Mr. Vasquez and Rare Breed Triggers were signed by Mr. Vasquez on January 18, 2021.
4. Rare Breed Triggers engaged Mr. Vasquez for his opinion on whether the FRT-15 was a machinegun, reasonably anticipating litigation over the issue.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on June 22, 2023.

By:


Kevin Maxwell